

EXHIBIT “C”

Jamie Felsen

From: Jamie Felsen
Sent: Wednesday, December 8, 2021 8:17 AM
To: Khalil Huey
Cc: Matthew Brown; Brenda Tapia
Subject: RE: Olman Eliseo Velasquez Fuentes v. Treadwell Park, et al. ADR Systems File NO. 51408CAMG

Khalil,

Are you saying you disregarded the payroll records when calculating \$24,509.73 in damages? If so, what is the basis for disregarding the payroll records? What data is your "own math and chart" based on? I am sure you can understand that because my client has payroll records establishing that Mr. Fuentes was paid MW and OT, I can't just tell my clients that Fuentes claims he is owed \$24,509.73 so they should pay that (or anything) to him. You have to give me something to work with if you want me to try to convince my client to pay something.

Jamie S. Felsen - Partner
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From: Khalil Huey <khuey@csm-legal.com>
Sent: Wednesday, December 8, 2021 8:00 AM
To: Jamie Felsen <jamiefelsen@mlaborlaw.com>
Cc: Matthew Brown <Matt@mlaborlaw.com>; Brenda Tapia <brenda@csm-legal.com>
Subject: Re: Olman Eliseo Velasquez Fuentes v. Treadwell Park, et al. ADR Systems File NO. 51408CAMG

The calculations are done as a matter of course as part of due diligence and zealous representation. Despite the pay records, our own math and chart indicates that he was paid below what he was owed. This damages chart was prepared with this in mind.

The Plaintiff's demand is \$24,509.73 but remains open to negotiation. As for why your client should settle, the avoidance of attorney's fees and the effect of a legal dispute should be enough to bring them to the table.

Respectfully,

Khalil Huey, Esq.

CSM Legal PC

60 East 42nd Street, Suite 4510

New York, NY 10165

212-317-1200 (office)

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khuey@csm-legal.com

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On Tue, Nov 16, 2021 at 5:04 AM Jamie Felsen <jamiefelsen@mllaborlaw.com> wrote:

What is your basis for recalculating the rates when the pay records establish he was paid hourly and includes his hourly and overtime rates? If your client is interested in a settlement, I need to give my client a reason why they should consider settling, so please explain why the rates need to be recalculated despite your client being paid hourly and an ot rate.

Once my client starts to pay arbitration fees it will be virtually impossible to settle, so I suggest you hold off pursuing the arbitration until you get clarification as to the basis for the claims.

On Nov 15, 2021, at 9:07 PM, Khalil Huey <khuey@csm-legal.com> wrote:

Hi Jamie,

The calculated rates of pay are a calculated amount caused by dividing the salary by number of hours worked. Overtime is that amount multiplied by 1.5.

We indeed have an amount we'd like you to communicate to your client. Plaintiff's initial demand is \$24,509.73. May I communicate with the Court that we wish to go forward with Arbitration?

Respectfully,

Khalil Huey, Esq.

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On Mon, Nov 15, 2021 at 5:19 PM Jamie Felsen <jamiefelsen@mlaborlaw.com> wrote:

Khalil,

Thank you for your e-mail. I provided your office with payroll records showing his regular and overtime rates, so I am not sure what the calc regular rate of pay and calc ot rate of pay represent. Please clarify and explain why you believe he is owed wages. And after you explain, if you have a demand you want me to convey to my client, please let me know what it is.

Jamie S. Felsen - Partner

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From: Khalil Huey <khuey@csm-legal.com>
Sent: Monday, November 15, 2021 4:22 PM
To: Jamie Felsen <jamiefelsen@mllaborlaw.com>
Subject: Olman Eliseo Velasquez Fuentes v. Treadwell Park, et al. ADR Systems File NO. 51408CAMG

Jaime,

Please accept my apologies in the tardiness of this response. It has been quite the change for my office as we transition law firms. Additionally, I believe my last attempt to reach out may have been foiled by my own spam filter.

Please find our damages chart below. At some points, there are two given entries for a given date. These have been noted.

Likewise, we believe that we are now ready to proceed with the Fuentes matter with arbitration. Please advise and I will draft an update to the court for your review.

Respectfully,

Khalil Huey, Esq.

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